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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

Sally C. Purser,)
)
Plaintiff,)
)
vs.)
)
Josef F. Boehm, Allen K. Bolling,)
and Bambi Tyree,)
)
Defendants.)
) **Case No. A05-0085 (JKS)**

**MOTION FOR ORDER
FREEZING DEFENDANT'S ASSETS**

Plaintiff, through undersigned counsel, hereby moves for an order freezing the assets of defendant, Joseph Boehm pending final judgment. More specifically, plaintiff seeks an order which restrains the transfer, sale or encumbrance of any asset, including ownership interest in Alaska Industrial Hardware, Inc., without prior leave of the court. This motion is filed pursuant to Local Rule 7.1 and Rule 65 of the Federal Rules of Civil Procedure and is supported by the memorandum of points and authorities filed herewith.

DATED this 6th day of September 2006 at Anchorage, Alaska.

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